

LAW OFFICES OF
DRATEL & MYSLIWIEC, P.C.
A PROFESSIONAL CORPORATION
2 WALL STREET
3rd Floor
NEW YORK, NEW YORK 10005
TELEPHONE (212) 732-0707
FACSIMILE (212) 571-3792
www.dratelmys.com

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JOSHUA L. DRATEL
AARON MYSLIWIEC

—
ALICE L. FONTIER
STUART A. WHITE
LINDSAY A. LEWIS

STEVEN WRIGHT
Office Manager
RYAN DUFFEY
Paralegal

June 21, 2011

BY FACSIMILE [(212) 805-7986]

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007-1312

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: *June 21, 2011*

Re: United States v. Taylor,
11 Cr. 310 (PGG)

Dear Judge Gardephe:

This letter is in regard to the above-entitled case, in which I represent Javel Taylor by CJA appointment, and requests, for the reasons set forth below, a two-day extension of time in which to file Mr. Taylor's Reply to the government's opposition to his pre-trial motions. This is the first request for an extension of time. The government, through Assistant United States Attorney Amy R. Lester, does not oppose this request.

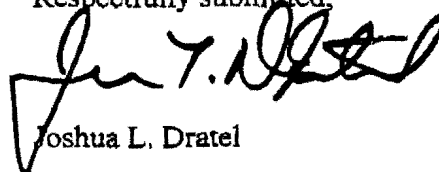
Mr. Taylor's pre-trial motions were filed June 3, 2011, and the government filed its opposition last Friday, June 17, 2011. Mr. Taylor's Reply is due tomorrow, Wednesday, June 22, 2011. The brief extension is requested because (a) I have been preparing for trial in *United States v. Kaziu*, 09 Cr. 660 (JG), in the Eastern District of New York, which commences next Monday, June 27, 2011; and (b) at the end of last week I was out of town speaking at a National Association of Criminal Defense Lawyers seminar, and as a result did not have an opportunity to review the government's reply until Sunday. Also, because the next court date in this case is not until July 21, 2011, this request for an extension of time would not affect any other scheduled dates. As noted above, the government, through Ms. Lester, does not oppose this request.

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Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
June 21, 2011
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Accordingly, it is respectfully requested that the Court grant Mr. Taylor a two-day extension of time, until Friday, June 24, 2011, to file his Reply Brief.

Respectfully submitted,



Joshua L. Dratel

JLD/saw

cc: Amy R. Lester
Assistant United States Attorney